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**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

**In re:**

**PURDUE PHARMA, INC., *et al.*,<sup>1</sup>**

**Debtors.**

)  
) Chapter 11  
)

) Case No. 19-23649(RDD)  
)

) (Jointly Administered)  
)

**THE TERRITORY OF AMERICAN SAMOA’S JOINDER TO  
THE STATE OF FLORIDA’S OBJECTION TO MOTION  
OF DEBTORS PURSUANT TO 11 U.S.C. § 105(A) AND 363(B) FOR ENTRY  
OF AN ORDER AUTHORIZING AND APPROVING SETTLEMENT TERM SHEET**

Through its Attorney General, the Territory of American Samoa, a creditor and party-in-interest in this action, joins *The State of Florida’s Objection to Motion of Debtors Pursuant to 11 U.S.C. § 105(a) and 363(b) for Entry of an Order Authorizing and Approving Settlement Term Sheet* [ECF No. 4413] (the “Objection”)<sup>2</sup> filed on March 4, 2022, and states as follows:

<sup>1</sup> The Debtors in these cases, along with the last four digits of each Debtor’s registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717) and SVC Pharma Inc. (4014). The Debtors’ corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

<sup>2</sup> Capitalized terms used but not defined herein have the meanings ascribed to them in the Objection.

**JOINDER AND STATEMENT**

1. The Territory of American Samoa joins in the Objection to the *Motion of Debtors Pursuant to 11 U.S.C. § 105(a) and 363(b) for Entry of an Order Authorizing and Approving Settlement Term Sheet* [ECF No. 4410] (the “Motion”), by which the Debtors seek approval of a settlement term sheet among the Debtors, the Sackler Mediation Parties, and eight States and the District of Columbia. The Territory of American Samoa does not object to settlement insofar as it seeks to provide States with additional value to be dedicated to desperately needed opioid abatement efforts. However, the Territory of American Samoa objects to any aspect of the settlement that provides disproportionately favorable treatment to the eight States and the District of Columbia over other States not party to the settlement. For the reasons set forth in the Objection, any funds to be distributed to the States under the settlement for abatement efforts must be distributed to all States in accordance with the previously agreed upon allocations approved by this Court.

**WHEREFORE**, the Territory of American Samoa, through its Attorney General, respectfully requests that the Court deny the Motion insofar as it seeks to provide the eight States and the District of Columbia with disproportionately favorable distributions in contravention of the allocation previously established in these cases.

Dated: March 8, 2022

Respectfully submitted:  
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**CERTIFICATE OF SERVICE**

The undersigned certifies that on March 8, 2022, a true and correct copy of *The Territory of American Samoa's Joinder to The State of Florida's Objection to Motion of Debtors Pursuant to 11 U.S.C. § 105(a) and 363(b) for Entry of an Order Authorizing and Approving Settlement Term Sheet* was filed electronically with the Clerk of the Court using Cm/ECF system which in turn sent notifications of such filing to all interested parties of record.

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